

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

v.

AHSHA NATEEF TRIBBLE [1]

Defendant.

CRIMINAL NO. 19-541-FAB

DEFENDANT'S SECOND MOTION FOR EXTENSION OF TIME TO FILE
DISCOVERY MOTIONS

TO THE HONORABLE COURT:

Defendant Ahsha Nateef Tribble respectfully requests an additional extension of time to file discovery motions as ordered by the Court:

1. On November 9, 2020, the Court ordered the parties to file discovery motions by December 15, 2020. [Docket 140].

2. On December 15, 2020, the defendant requested additional time to file discovery motions in order to allow time to receive and review a supplemental production of discovery that the government anticipated would take twenty (20) days. [Docket 146].

3. Defendant and the government have been engaged in conversations to finalize and resolve all discovery issues. Defense counsel has been informed by the government that additional information is being compiled in Washington, D.C. for production. The

supplemental discovery request made by defendant Tribble to the government on November 16, 2020 was comprehensive, and discovery for this matter is voluminous.

4. Once defense counsel receives the supplemental discovery from the government, counsel for defendant Tribble will be in a position to ascertain whether additional discovery motions are necessary, and what substantive motions should be filed. Therefore, we request an additional term of 15 days after the government produces the supplemental discovery to file any additional discovery motions and to propose a schedule for filing substantive motions.

5. We have discussed this matter with AUSA Seth Erbe and the government does not object to this request.

WHEREFORE, it is respectfully requested that the Court grant defendant Ahsha Nateef Tribble this Motion for an Extension of Time to File any additional discovery motions and to propose a schedule for filing substantive motions.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this January 12, 2021.

s/Deana Timberlake-Wiley
Deana Timberlake-Wiley
(*Pro Hac Vice*)
Simmons, Finney & Winfield, LLC
741 W. Lanier Avenue
Suite 220
Fayetteville, GA 30214
Office: 678-788-6030
Email: dwiley@sfwlegalteam.com

s/juan r. acevedo-cruz
Juan R. Acevedo-Cruz (120701)
Suite 501-A
Banco Cooperativo Plaza
623 Ave. Ponce De León
San Juan PR 00917
Tel/Fax (787) 751-2341
Email: jr@jracedo.com

CERTIFICATION

IT IS HEREBY CERTIFIED that on this same date I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

s/juan r. acevedo-cruz
Juan R. Acevedo-Cruz (120701)